

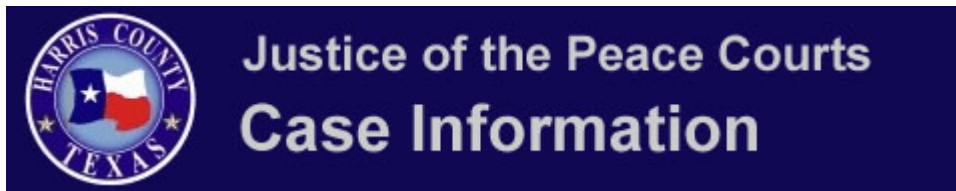
**EXHIBIT A**

Pursuant to the Federal Rules of Civil Procedure and the Local Rules of the Southern District of Texas, the following documents are attached to this Notice:

<b>Index</b>	<b>Document</b>	<b>Date</b>
<b>B</b>	Docket Sheet of State Court Action	printed 9/01/2021
<b>B-1</b>	Plaintiff's Original Petition	8/2/2021
<b>B-2</b>	Citation to Toyota Financial Services	8/2/2021
<b>B-3</b>	Defendant's Motion for Extension of Time	8/18/2021
<b>B-4</b>	Order Granting Motion for Extension	8/26/2021
<b>C</b>	A list of all counsel of record, including addresses, telephone numbers, and parties represented	

## **Exhibit B**

### **Harris County Docket Sheet**

**Case Summary for 215200218949 as of September 1, 2021 2:54:18 PM :****General Case Information**

**Case Number:** 215200218949  
**Court Info:** [Click here to visit court web site.](#)  
**Style of Case:** Felix Ugorji vs. Toyota Financial Services  
**Filed Date:** August 02, 2021  
**Days Old:** 30  
**Case Status:** Active  
**Disposition:**  
**Disposition Date:**  
**Judgment Date:**

**Civil Information**

**Nature of Claim:** Small Claims  
**Claim Amount:** \$10,000.00

**Party Information****Party Name:** Ugorji, Felix**Party Type:** Plaintiff**Party Name:** Toyota Financial Services**Party Type:** Defendant**Party Name:** Robertson, George G**Party Type:** Attorney**Hearing Information**

**Payment Information**

<b>Payment Date:</b>	August 02, 2021
<b>Amount:</b>	\$49.00
<b>Payment Type:</b>	Cash
<b>Transaction Type:</b>	Payment
<b>Receipt Description:</b>	Payment
<b>Payor Name:</b>	Ugorji, Felix

**Event Information**

<b>Event Description:</b>	Citation
<b>Date Added:</b>	August 02, 2021

<b>Event Description:</b>	Original Petition Filed
<b>Date Added:</b>	August 02, 2021

<b>Event Description:</b>	Small Claims-Citation Money Damages
<b>Date Added:</b>	August 02, 2021

<b>Event Description:</b>	Motion Filed
<b>Date Added:</b>	August 18, 2021

<b>Event Description:</b>	Order Signed
<b>Date Added:</b>	August 26, 2021

**Bond Information****Judgment Information****Disclaimer**

Although Harris County Justice of the Peace Courts make every effort to ensure that information provided is accurate, neither Harris County nor any agency, officer, elected official or employee of Harris County, warrants the accuracy, reliability, or timeliness of any information on this web site and shall not be liable for any losses caused by such reliance on the accuracy, reliability or timeliness of such information, including, but not limited to incidental and consequential damages. This publication is provided "as is" without warranty of any kind, either expressed or implied, including, but not limited to, the implied warranties of merchantability, fitness for a particular purpose or non-infringement.

Any person who relies on information obtained from this website does so at his or her own risk. In addition, nothing contained within this web site is an official record of Harris County or the elected officials responsible therefore. All official records of Harris County and the offices of countywide elected officials are on file in their respective offices and may be reviewed by the public at those offices.

Please note: Because case status may change at any time, the case information displayed may not be accurate. If you have any questions about the case status shown, you should verify the information with the official case record.

## **Exhibit B-1**

### **Plaintiff's Original Petition**

## Small Claims Petition

NO. 215200218949FELIX UGORJI

§ In the Justice Court of Harris County, Texas

§ Precinct \_\_\_\_\_ Place \_\_\_\_\_

Plaintiff(s)

vs.

TOYOTA FINANCIAL SERVICES

§

§

§

§

§

RECEIVED

AUG - 2 2021

Defendant(s)

Plaintiff: FELIX UGORJI

Hon. Jeff Williams

JUSTICE OF THE PEACE 5/2

Describe the legal nature of the plaintiff (e.g., individual, sole proprietorship, partnership, corporation)

INDIVIDUALDefendant: TOYOTA FINANCIAL SERVICESAddress: P.O. BOX 9490City: CEDAR RAPIDSState: IAZip: 52409

Date of Birth (if applicable): \_\_\_\_\_

Describe the legal nature of the defendant (e.g., individual, sole proprietorship, partnership, corporation)

CORPORATION

\*Defendant may be served by serving

C.T. CORPORATION

(state the name of the defendant if defendant is an individual, or state the name and title of the person who is authorized to receive service of process for the defendant if defendant is a partnership, limited partnership, corporation, or limited liability company), who may be served at

1999 BRYAN ST., STE. 900 DALLAS TX 75201

(state the address for service of process).

The defendant's usual place of business or residence, or other place where defendant can probably be found is \_\_\_\_\_

## Cause of Action

(State the cause of action in plain and concise language, sufficient to give fair notice of the claim and to provide enough information to enable the defendant to prepare a defense. You may include information showing venue is proper in the Justice of the Peace Precinct in which you are filing. If you are seeking personal property, you must describe the property and state the value of the property.)

Toyota Financial Services wrongfully reported negative information to the Credit Services which made it impossible for me to qualify for a new house I wanted to purchase. Toyota Financial Services signed me up for a gap insurance that refused to pay for the damaged vehicle.

Relief Requested (Describe the relief you are requesting, itemizing the amount of damages you are seeking.)

Plaintiff is seeking for Toyota Financial Services to remove all negative reports on my Credit and to pay \$10,000 for the financial losses caused by their action.

Respectfully submitted,

Felix Ugorji

Signature of Plaintiff or Plaintiff's Attorney of Record

X Printed Name: Felix Ugorji  
State Bar No. \_\_\_\_\_Address: 19603 BUCKLAND PARK DR. KATY TX 77449Telephone: 832-602-0709

Fax Number: \_\_\_\_\_

E-Mail Address: FEMERCKINTL@YAHOO.COM☐ Plaintiff consents to the e-mail service of the answer and any other motions or pleadings to this e-mail address.



**Instruction:** A plaintiff requesting a default judgment must provide to the Clerk in writing the last known mailing address of the defendant. This notice must be filed at or before the time the default judgment is signed. The clerk must immediately mail written notice of the default judgment to the defendant at the address provided. Rule 503.1

NO. \_\_\_\_\_

FELIX UGORTI  
PLAINTIFF(S)

VS.  
TOYOTA FINANCIAL CORP.  
DEFENDANT(S)

§ IN THE JUSTICE COURT OF  
§ HARRIS COUNTY, TEXAS  
§ PRECINCT \_\_\_\_ PLACE \_\_\_\_  
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**NOTICE OF DEFENDANT'S LAST KNOWN MAILING ADDRESS**

The undersigned certifies that the last known mailing address of the defendant against whom a default judgment is taken in this case is:

Defendant's name: TOYOTA FINANCIAL CORPORATION

Defendant's last known mailing address: PO BOX 9490 CEDAR RAPIDS IA 52409

Submitted on 7/30/21

Felix Ugorti  
(Signature of Plaintiff or Plaintiff's Attorney of Record)  
Printed Name: FELIX UGORTI  
Address: 19603 BUCKLAND PARK DR.  
KATY TX 77449  
Telephone: 832-602-0709  
Fax: \_\_\_\_\_  
E-Mail: femercint@yahoo.com

**RECEIVED**  
AUG - 2 2021  
Hon. Jeff Williams  
JUSTICE OF THE PEACE 5/2

**CAUSE NUMBER (FOR CLERK USE ONLY):** \_\_\_\_\_

**STYLED**

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition is filed to initiate a new suit. The information should be the best available at the time of filing. This sheet, required by Rule of Civil Procedure 502, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

<b>1. Contact information for person completing case information sheet:</b>  <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> Name: <u>FELIX UGORJI</u>   Address: <u>19603 BUCKLARK PARK DR.</u>   City/State/Zip: <u>KATY TX 77449</u>   Email: <u>FEMERCKINIL@YAHOO.COM</u>   Signature: <u><i>Felix Ugorji</i></u> </div> <div style="width: 45%;"> Telephone: <u>832-602-0709</u>   Fax: _____   State Bar No: _____ </div> </div>	<b>2. Names of parties in case:</b>  Plaintiff(s): <u>FELIX UGORJI</u>  Defendant(s): <u>TOYOTA FINANCIAL SERVICES</u>  <div style="text-align: center; border: 1px solid black; padding: 5px; margin: 10px auto; width: 80%;"> <b>RECEIVED</b>  AUG - 2 2021  Hon. Jeff Williams  <b>JUSTICE OF THE PEACE 5/2</b> </div> <p style="font-size: small; margin-top: 5px;">[Attach additional page as necessary to list all parties]</p>
<b>3. Indicate case type, or identify the most important issue in the case (select only 1):</b>	
<input type="checkbox"/> <b>Debt Claim:</b> A debt claim case is a lawsuit brought to recover a debt by an assignee of a claim, a debt collector or collection agency, a financial institution, or a person or entity primarily engaged in the business of lending money at interest. The claim can be for no more than \$10,000, excluding statutory interest and court costs but including attorney fees, if any.	<input type="checkbox"/> <b>Eviction:</b> An eviction case is a lawsuit brought to recover possession of real property, often by a landlord against a tenant. A claim for rent may be joined with an eviction case if the amount of rent due and unpaid is not more than \$10,000, excluding statutory interest and court costs but including attorney fees, if any.
<input type="checkbox"/> <b>Repair and Remedy:</b> A repair and remedy case is a lawsuit filed by a residential tenant under Chapter 92, Subchapter B of the Texas Property Code to enforce the landlord's duty to repair or remedy a condition materially affecting the physical health or safety of an ordinary tenant. The relief sought can be for no more than \$10,000, excluding statutory interest and court costs but including attorney fees, if any.	<input checked="" type="checkbox"/> <b>Small Claims:</b> A small claims case is a lawsuit brought for the recovery of money damages, civil penalties, personal property, or other relief allowed by law. The claim can be for no more than \$10,000, excluding statutory interest and court costs but including attorney fees, if any.

## **Exhibit B-2**

### **Citation to Toyota Financial Services**

Case Number: 215200218949

Felix Ugorji  
Plaintiff  
vs.  
Toyota Financial Services  
Defendant

§  
§  
§  
§  
§  
§  
§

In the Justice Court  
Harris County, Texas  
Precinct 5, Place 2  
16715 Clay Road  
Suite 3  
Houston, TX 77084  
713-274-0800  
[www.jp.hctx.net](http://www.jp.hctx.net)

**Citation (Small Claims Case)**

THE STATE OF TEXAS  
COUNTY OF HARRIS

**TO: ANY SHERIFF, CONSTABLE, PROCESS SERVER CERTIFIED UNDER ORDER OF THE SUPREME COURT, OTHER PERSON AUTHORIZED BY COURT ORDER, OR CLERK:**

Deliver this citation, together with a copy of the petition, to: **CT CORPORATION**

Toyota Financial Services  
1999 Bryan St  
Ste 900  
Dallas, Tx 75201

**TO THE DEFENDANT:**

**You have been sued. You are commanded to appear by filing a written answer to the petition filed by Plaintiff with the Clerk of the Court on or before the end of the 14<sup>th</sup> day after the date of service of this citation. If you fail to file an answer as required, a judgment by default may be rendered for the relief demanded in the petition.**

Date Petition Filed: 08/02/2021

Nature of demand made by Plaintiff(s): money owed in the amount of **\$10,000.00**. A copy of the petition is attached.

**Notice**

**You have been sued. You may employ an attorney to help you in defending against this lawsuit. But you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14<sup>th</sup> day after the day you were served with these papers. If the 14<sup>th</sup> day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14<sup>th</sup> day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult the Texas Rules of Civil Procedure, Part V, Rules of Practice in Justice Courts. A copy of the Rules is available at <http://www.jp.hctx.net/> or at the Justice Court.**

Date: 8/2/2021



/s/ Ana Gallo  
Clerk of the Court  
Harris County Justice Court  
Precinct 5, Place 2

Address of Plaintiff

**Certified Mail Tracking # 7015 1520 0002 2989 3688**

19603 Buckland Park Dr  
Katy TX 77449

**Exhibit B-3**

**Defendant Toyota Motor Credit  
Corporation's Motion for Extension of Time  
to File a Response to Plaintiff's Original  
Petition**

EF

CAUSE NO. 215200218949

FELIX UGORJI,

*Plaintiff,*

v.

TOYOTA FINANCIAL SERVICES,

*Defendant.*§  
§  
§  
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§  
§

IN THE JUSTICE COURT

OF HARRIS COUNTY, TEXAS

PRECINCT 5, PLACE 2

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**DEFENDANT TOYOTA MOTOR CREDIT CORPORATION'S MOTION FOR  
EXTENSION OF TIME TO FILE A RESPONSE TO  
PLAINTIFF'S ORIGINAL PETITION**

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TO: THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant Toyota Motor Credit Corporation, incorrectly named as "Toyota Financial Services" ("TMCC"), hereby moves this Honorable Court, pursuant to Rule 5 of the Texas Rules of Civil Procedure, as well as other applicable law, for an order granting an extension of time for TMCC to respond to Plaintiff Felix Ugorji's ("Plaintiff") Original Petition. TMCC requests an additional sixteen (16) days to respond, through and including Friday, September 3, 2021. This is the first extension requested by TMCC. In support, TMCC shows this Honorable Court the following:

1. Plaintiff filed her Petition in the Justice Court, Harris County, Texas, Precinct 5, Place 2 on August 2, 2021. Plaintiff served TMCC on August 4, 2021, and TMCC's response to Plaintiff's Petition is, thus, due on Wednesday, August 18, 2021.

2. The undersigned counsel was recently retained to represent TMCC in this matter and both the undersigned and TMCC are finalizing their investigation of the facts alleged in the Petition, and need this short extension of time to complete such investigation and prepare an adequate response to the Petition.

3. Prior to submitting this Motion, counsel for TMCC attempted to confer with *Pro Se* Plaintiff via email, but as of the filing of this Motion, Plaintiff has not responded to the request to the short sixteen (16) day extension of time requested herein.

4. This Motion is made in good faith and is not intended to delay prosecution of this case. Moreover, no party will be prejudiced by the relief requested in this Motion.

5. Therefore, TMCC respectfully requests that this Honorable Court enter an Order extending the time to file their response to Plaintiff's Petition by sixteen (16) days from the original response deadline, through and including September 3, 2021.

WHEREFORE, Defendant Toyota Motor Credit Corporation, incorrectly named as Toyota Financial Services respectfully requests that this Honorable Court grant it a sixteen (16) day extension of time to respond to Plaintiff's Petition, through and including September 3, 2021, and for such other and further relief as this Court deems necessary or appropriate.

Dated: August 18, 2021

Respectfully submitted,

**HOLLAND & KNIGHT LLP**

By: /s/ George G. Robertson

George G. Robertson

State Bar No. 24106352

george.robertson@hklaw.com

1100 Louisiana Street, Suite 4300

Houston, Texas 77002-5227

713-821-7000 (Telephone)

713-821-7001 (Facsimile)

**COUNSEL FOR DEFENDANT**

**TOYOTA MOTOR CREDIT CORPORATION**

**CERTIFICATE OF SERVICE**

I certify that on the 18th day of August, 2021, in accordance with the Texas Rules of Civil Procedure, I served a true and correct copy of the foregoing via the Court's E-File Service and United States First Class Mail addressed to the following:

Felix Ugorji  
19603 Buckland Park Dr.  
Katy, TX 77449  
Telephone: (832) 602-0709  
Email: femerc.kintl@yahoo.com  
***Pro Se Plaintiff***

/s/ George G. Robertson  
George G. Robertson



**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Diana Miranda on behalf of George Robertson  
 Bar No. 24106352  
 diana.miranda@hklaw.com  
 Envelope ID: 56439492  
 Status as of 8/19/2021 11:54 AM CST

## Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Angela Smith		angela.smith2@hklaw.com	8/18/2021 4:23:31 PM	SENT
diana miranda		diana.miranda@hklaw.com	8/18/2021 4:23:31 PM	SENT
George Robertson		george.robertson@hklaw.com	8/18/2021 4:23:31 PM	SENT
Felix Ugorji		femerc.kintl@yahoo.com	8/18/2021 4:23:31 PM	SENT

## **Exhibit B-4**

### **Order**

CAUSE NO. 215200218949

FELIX UGORJI,

*Plaintiff,*

v.

TOYOTA FINANCIAL SERVICES,

*Defendant.*§  
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IN THE JUSTICE COURT

OF HARRIS COUNTY, TEXAS

PRECINCT 5, PLACE 2

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**ORDER**

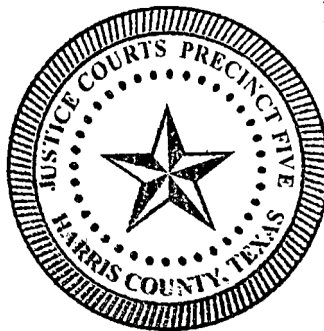
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On this day, the Court considered Defendant Toyota Motor Credit Corporation, incorrectly named as Toyota Financial Service's **Motion for Extension of Time to Respond to Plaintiff's Original Petition** (the "Motion"). After considering the Motion, any response and reply thereto, argument of counsel, controlling law, the evidence presented, and any papers in the file or otherwise available to the parties, the Court is of the opinion that the Motion should be **GRANTED**.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED that Toyota Motor Credit Corporation, incorrectly named as Toyota Financial Service's response to Plaintiff Felix Ugorji's Original Petition shall be due on September 3, 2021.

SO ORDERED this \_\_\_\_ day of AUG 24 2021, 2021

  
\_\_\_\_\_  
PRESIDING JUDGE



**APPROVED AND ENTRY REQUESTED:**

**HOLLAND & KNIGHT LLP**

/s/ George G. Robertson

George G. Robertson

State Bar No. 24106352

George.Robertson@hkllaw.com

1100 Louisiana Street, Suite 4300

Houston, Texas 77002

713-821-7000 (Telephone)

713-821-7001 (Facsimile)

ATTORNEYS FOR DEFENDANT

TOYOTA MOTOR CREDIT CORPORATION

**Exhibit C**

**List of Parties and Counsel of Record**

**List of Parties and Counsel of Record**

In accordance with LR 81(6), Defendant Toyota Motor Credit Corporation submit this list of all counsel of record:

<b><i>Pro Se</i> Plaintiff</b> Felix Ugorji	Felix Ugorji 19603 Buckland Park Dr. Katy, TX 77449 Telephone: (832) 602-0709 Email: femerc.kintl@yahoo.com
<b>Defendant</b> Toyota Motor Credit Corporation	<b>Counsel</b> George G. Robertson State Bar No. 24106352 Holland & Knight LLP 1100 Louisiana Street, Suite 4300 Houston, Texas 77002-5227 713-821-7000 (Telephone) 713-821-7001 (Facsimile) Email: george.robertson@hklaw.com